

February 28, 2012

Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, California 92501-3348

Attention: Dave Woelfel

Subject: **Basin Plan Amendments to Revise Recreation Standards for Inland Fresh Surface Waters in the Santa Ana Region**

Dear Mr. Woelfel:

The Orange County Business Council, representing the largest and most innovative employers in America's sixth largest county supports the adoption of the proposed Basin Plan Amendments to revise recreation standards for inland fresh surface waters in the Santa Ana Region.

We appreciate the efforts of the Stormwater Quality Standards Task Force to evaluate the science underlying water quality criteria for bacteria and establish standards for recreational use designs and implementation strategies. As a result, the proposed Basin Plan Amendments will help assure that human health will be protected within our region and that public resources will be expended reasonably and fairly.

The proposed changes recognize the need for the safe expansion of recreation and community areas, taking into account concerns regarding bacteria levels. The Basin Plan Amendments update the region's water quality objectives for indicator bacteria to conform to USEPA's recommended criteria, and the amendments incorporate a narrative objective to assure that waste discharges do not contain human pathogens at levels that will increase the risk of illness. These proposed changes support the safe expansion of our community as Orange County meets the demands of an ever growing, ever active population.

The Orange County Business Council commends the Santa Ana Regional Board for its efforts with the Stormwater Quality Standards Task Force. This comprehensive effort has established a firm scientific foundation for the future implementation of recreational design plans within our community.

Thank you for your consideration of our comments.

Sincerely,



Kate Klimow
Vice President, Government Affairs